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September 24, 2023

BY ECF

The Honorable Lorna G. Schofield
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Cypress Holdings, III, L.P. v. Hall*, No. 1:22-cv-1243 (LGS)
Sport-BLX, Inc. v. Salerno, No. 1:22-cv-8111 (LGS)

Dear Judge Schofield:

We represent Sport-BLX, Inc., Sport-BLX Securities, Inc., Clinton Group, Inc., George Hall, Cesar Baez, and Christopher Johnson (the “Sport-BLX Parties”) in the above-referenced actions. We write, together with counsel for GlassBridge Enterprises, Inc., Francis Ruchalski and Daniel Strauss (collectively, the “GlassBridge Defendants”) and Joseph De Perio, regarding the pre-motion conference letters to be submitted on September 27 (the “Letters”) pursuant to Your Honor’s Individual Rules and Procedures, to request a page-limit extension for the Letters.

The Sport-BLX Parties anticipate filing two Letters: one will seek dismissal of the eight derivative claims in the Second Amended Complaint (“SAC”) under Fed.R.Civ.P. 23.1 because Cypress “does not fairly and adequately represent the interests of [similarly situated] shareholders”; the other pre-motion conference letter will seek summary judgment on all counts of the SAC against the Sport-BLX Parties under Fed.R.Civ.P. 56. The Sport-BLX Parties’ Rule 23.1 letter will be three pages, and it will be a joint letter on behalf of all defendants.

Given the length and complexity of the SAC, consisting of 240 paragraphs and 11 direct and eight derivative causes of action against 10 defendants, the Sport-BLX Parties anticipate that their pre-motion conference summary judgment letter will exceed the Court’s three-page limit, and will be six to seven pages. The defendants are coordinating their submissions, and the Sport-BLX Parties will file a joint letter with Mr. De Perio. The GlassBridge Defendants will be submitting a letter of not more than three pages in length regarding claims specific to the GlassBridge Defendants – resulting in Rule 56 letters of not more than 10 pages in length for all 10 defendants.

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For these reasons, we believe the enlarged page limit is warranted and respectfully request permission to file the letters as described above.

Respectfully submitted,

/s/ Jonathan S. Sack

Jonathan S. Sack